NPDES Roundtable Meeting Notes

MS Teams Meeting, Hosted by
Central Valley Regional Water Board

April 15, 2020
9:00 AM – 1:30 PM

ITEM	1	Assigned to:	Time
Title of Topic	**INTRODUCTIONS/REVIEW AGENDA AND ACTION ITEMS**	Region 5	9:00-9:15 (15 minutes)
Purpose	Roll call and review agenda.		
Desired Outcome	Get attendance and finalize agenda.		
Background			
Contact Person	Jim Marshall, [HYPERLINK "mailto:james.marshall@waterboards.ca.gov"]		
Attachments/ Links:	[EMBED Word.Document.12 \s]		
Notes	Role Call: R1- Heaven Moore, Justin McSmith, Cathie Goodwin, Claudia Villacorta R2- Bill Johnson, Robert Schlipf, Jessica Watkins R3- Katie DiSimone, Phillip Hammer, Harvey Packard, Anderson Tamara R4- Veronica Cuevas, Augustine Anijielo, Jeong-Hee Lim R5- Jim Marshall, Xuan Luo, Kari Holmes, Alex MacDonald, Dania Jimmerson R6- Russell Norman, Jehiel Cass, Mark Lemus R7- Kai Dunn, Jose Valle De Leon, Abdi Haile R8- Mark Smythe, Susan Beeson, Michael Perez, Joy Jayne R9- Brandy Beals SB- Afrooz Farsimadan, Steve Cheung, Walter Mobley, Wendy Linck, Rebecca Greenwood, Shahla Faranak, Renan Jauregui, Chand Gurgagn OIMA- Bev Anderson OE- Jim Fischer, Ruey-wen Wang USEPA R9- Becky Mitchell, Pascal Mues, Amelia Whitson, Julie Song Others – Andrew Hamilton (ELAP), Audrey Signorelli (PG Environmental)		
Decisions			
Action Items			
Action Item Attachments			

ITEM	2	Assigned to:	Time
Title of Topic	**POTW PFAS ORDER UPDATE**	Annalisa Kihara	9:15-9:40 (25 minutes)
Purpose	Information sharing		
Desired Outcome			

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Background	As part of the Water Board's Per- and Polyfluoroalkyl Substances (PFAS) Phased Investigation efforts, staff are developing a statewide investigative order requiring a total of 284 municipal POTWs to test their wastewater and biosolids for PFAS.
Attachments/ Links:	[EMBED Word.Document.12 \s]
Contact Person	Annalisa Kihara, Wendy Linck, Alex MacDonald
Notes	Current Timeline for Draft Order: -End of March Draft was sent out to Regional Boards, -Currently reviewing comments and editing. Concurrently briefing State Water Board members for input. Next Steps: -Updated draft with edits and responses to comments from Regional Boards Current Release anticipated for May 2020. Objective: To determine the amount of PFAS entering POTWs through influent, effluent, biosolids and groundwater monitoring and sampling. A questionnaire to dischargers will also be a tool for determining PFAS transport. -Requirements for sampling for POTWs based on average dry weather flow and categorized as POTWs 1-5 MGD and those that are >5MGD. -Sample frequencies vary by category. Regional Boards may extend or discontinue monitoring for subsequent years. Intent is to have all data collected available electronically for use. Recent studies around the country have found correlations with PFAS in influent, effluent, and biosolids from POTWs, have found some reductions throughout the treatment processes, as well as some transformations and replacements into other compounds of PFAS throughout the treatment process. Currently 5,000 different kinds of PFAS compounds and non-drinking water analysis is capable sampling for 25-30 to identify categories of PFAS for this order Please see attached PFAS update for detailed information.
Decisions	
Action Items	

ITEM	**3**	**Assigned to:**	**Time**
Title of Topic	**RECYCLED WATER POLICY**	Rebecca Greenwood	9:45-10:10 (25 mins)
Purpose	Update the NPDES Roundtable on the status volumetric annual report for wastewater and recycled water.		
Desired Outcome	Information Sharing		
Background	On March 2, 2020, the State Water Board published the volumetric annual reporting module in GeoTracker for all wastewater and recycled water permittees to begin reporting annual volumes of wastewater and recycled water per the requirements of the Recycled Water Policy. Information on the reporting module and a link to		

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	GeoTracker ESI can be accessed here: [HYPERLINK "https://www.waterboards.ca.gov/water_issues/programs/water_recycling_policy/volumetric_annual_reporting.html"] Data generated by the volumetric annual report will assist the state in tracking progress towards the current recycled water goals in the Recycled Water Policy and the Draft Water Resilience Portfolio in response to Executive Order N-10-19; evaluating the potential for increased recycled water use; and assisting with statewide water supply planning efforts.
Attachments/ Links:	
Contact Person	Rebecca Greenwood, [HYPERLINK "mailto:rebecca.greenwood@waterboards.ca.gov"]
Notes	Update on Recycle Water Policy Implementation of the Volumetric Annual Reporting of Wastewater and Recycled Water. Order will remain in effect until Regional Boards update the Discharger's permit to rbe consistent with requirements of this order. Water Board staff are working on integrating language for NPDES template and use in WDR permits that will include supporting findings and MRP direction for monitoring and reporting in Geotracker. Updated Order Adopted January 24, 2020. Volumetric Annual Report Due April 30, 2020. **Note**: Any facilities that are requesting extensions of deadlines due to COVID-19, requests will need to be provided in written form through email to [HYPERLINK "mailto:recyledwater@waterboards.ca.gov"]. As of this meeting 165 reports have been submitted of the 820 required. Regional Boards can access spreadsheet to identify those dischargers who have claimed Geotracker Site and/or submitted reports on Geotracker [HYPERLINK "https://geotracker.waterboards.ca.gov/regulators/reports/avr_report"]. At this point State Board will take on role of enforcement for Dischargers who have not submitted reports.
Decisions	
Action Items	Provide presentation (see attachment below). [EMBED Acrobat.Document.DC]

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ITEM	4	Assigned to:	Time
Title of Topic	**EPA UPDATES**	EPA	10:10-11:10 (40 minutes)
Purpose	Share EPA NPDES Regulatory and Policy Updates		
Desired Outcome	Information Exchange		
Background	1. Permit reissuance best practices: Mid-year estimates from CIWQS indicate minimal increases in the percentage of current permits and is there a way that we can further assist? Can RBs share their best practices? 2. Oil and grease method requirements: The Environmental Laboratory Accreditation Program (ELAP) informed EPA that permittees are not providing an additional sample volume (matrix spike [MS]) to laboratories when analyzing for oil and grease via method 1664. Quality Control is performed on the MS to inform how well the analytical method works in the actual sample matrix. The validity of sample results can be challenged without the MS being analyzed, as it cannot be demonstrated that the method works in the sample matrix tested (i.e., met method control criteria). Laboratories have been requesting permittees to provide the MS, but the problem is persisting. 3. Pandemic wastewater operations discussion: What are you hearing and is there a way we can further support you? 4. 316(b) Update Presentation.		
Attachments/ Links:	1. [HYPERLINK "https://www.epa.gov/npdes/npdes-program-management-and-oversight" \l "backlog"]		
Contact Person	Becky Mitchell 415-972-3497		

Notes	1. A. Requests for EPA assistance to Region Boards: R6 – Future Pretreament compliance inspections might be problematic with the transfer of responsibilities to Regional Boards from contractor due to staff turnover. R7 – NPDES writing issues that might require workshops. R1 – Teams refresher meeting for Water Board staff on topics such as Reasonable Potential Analysis and evaluating sufficiently sensitive methods. B. Regional Board Best Practices R2 – **1)** Establish realistic deadlines for staff and dischargers and sticking to them. **2)** Program into timeline 6-9 months before application deadline check in for permits, to determine what is needed to draft the permit including special studies that need to take place by dischargers. **3)** Spend time writing out rationales for fact sheets, more time required upfront, but creates roadmap that streamlines permit reissuance especially when staff turnover is a concern, results in uncontested items on proposed permits. **4)** Maintain good positive relationships with Dischargers and spend time early in process to work through issues. **5)** A reminder that NPDES permits are re-issued every 5 years and mistakes can be fixed in the next cycle. R4 – **1)** Before permit is up for re-issue, spend time with smaller dischargers that will require more time and assistance to complete ROWD 6 months before expiration date, larger dischargers tend to know the routine of re-issuance. **2)** To ease ROWD for permit writers ask Dischargers to submit ROWD Data in excel format easier analysis of RPA. **3)** Send out a staff working draft to discharger before tentative to help identify issues to avoid contesting of items. **4)** CIWQS data extraction and TMDL familiarity. **5)** Requesting dischargers to submit annual summary report that highlights any pollutants that triggered RP as erroneous or persistent issues. **6)** RPA spreadsheet that is adaptable to staff. **7)** Subscribing to State Boards Iyris emails to help identify new regulations and policies. **8)** Keep an electronic word file of current permit to use as a starting point for new permit writers. **9)** Turnover presents difficulties in experienced permit writers, this will require future training of new staff. **10)** Compliance History review of data by Enforcement staff. R5 – **1)** ROWD required 1 year before expiration date. **2)** Effluent receiving water characterization monitoring completed in second year of permit term. **3)** Mid permit (year 3 of permit cycle) review with quick RPA and of any reports submitted and ROWD reminder Letter. Still gives 2 years to resolve issues before permit expires and allows more time for additional monitoring of RPA flags. R1 – **1)** Working on permits concurrently helps with common permit language and sharing thoughts that can help with efficiency.

	2. Oil and Grease EPA Method 1664: Issue has been noted that permittees have not been providing enough sample volume. Samples data results are not valid if permittees do not provide enough sample to run a matrix spike. ELAP Representative – Have not heard of this issue, this is an unapproved sample method deviation. ELAP inspections if labs to verify proper analysis possible as well as an email to Lyris list to labs to remind them of sufficient sample volume. Regional Boards – No identified issues observed from dischargers. 3. Pandemic Wastewater Operations: A. Regional Board received Requests from Dischargers R9 - Dischargers requests to suspend ocean discharge monitoring due to inability to sample due to beach closures and social distancing guidelines for boats. No reply developed. R1 – Dischargers have essential staff scheduled to take certification exams and our concerned about access to tests. Send discharger concerns to OOC to possibly provide emergency exams where dischargers have known retirements or lack of appropriately certified staff on a case by case basis. R2 – Mention of CWEA Recorded Webinar regarding Wastewater Operations during COVID-19. [HYPERLINK "http://cweawaternews.org/follow-up-to-cweas-covid-19-webinar-on-4-1-20/"] ELAP Andrew Hamilton– ELAP has provided a website that identifies Labs that have emergency capabilities and capacity if local discharger certified laboratories that suspend operations. Dischargers should reach out to ELAP for assistance with laboratories who must suspend operations. [HYPERLINK "https://www.waterboards.ca.gov/elap-covid19/"]. 4. 316(b) Rule: Julie Song, [HYPERLINK "mailto:song.julie@epa.gov"] Policy on Use of Coastal and Estuarine Waters for Power Plant Cooling NPDES, State Board's "Once Through Cooling (OTC) Policy). Currently 11 power plants out of 13 facilities subject to 316(b) rule. Please provide fact sheets and permit applications to ESA consultants. As reissuance occurs on these permits EPA will work with Regional Boards on ESA consultation steps and with any additional information that will be required for fact sheets and permit applications. Topic will be revisited at next NPDES Roundtable.
Decisions	
Action Items	Provide 316(b) rule Presentation and ESA contacts. [EMBED PowerPoint.Show.12][EMBED Acrobat.Document.DC]

LUNCH BREAK
11:10 – 12:25 PM
(1.25 hours)

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ITEM	5	Assigned to:	Time
Title of Topic	**STATE WATER BOARD NPDES PROJECT UPDATES**	State Water Board	12:25-12:42 (12 minutes)
Purpose	Update the NPDES Roundtable on the status of the statewide orders and projects		
Desired Outcome	Information sharing		
Background	Update the NPDES Roundtable on the Status of: 1. Proposed Statewide Suction Dredge Mining Permit – Renan 2. Proposed Statewide Sanitary Sewer System Order Reissuance – Walter 3. Proposed Virtual Pre-Inspection Forum with Office of Enforcement - Walter 4. Permit Backlog and Permit Reissuance Plan – Gur 5. PG Environmental Scheduled Inspections – Steve		
Attachments/ Links:			
Contact Person	• Afrooz Farsimadan - (916) 341-5544 • Renan Jauregui - (916) 341-5505 • Walter Mobley - (916) 323-0878 • Gurgagn Chand - (916) 341-5780 • Steve Cheung - (916) 641-5688		
Notes	Update the NPDES Roundtable on the Status of: 1. Proposed Statewide Suction Dredge Mining Permit – Renan, Received greenlight response from Governor, will go out for public comment /hearing May 19th, 2020. Draft permit has been submitted to Regional Boards and EPA, received responses from EPA, R1, R5 and R2; revised permit is now in final management review and briefing with State Board Members. 2. Proposed Statewide Sanitary Sewer System Order Reissuance – Walter Staff have drafted body and attachments up to SSMP, and in management review. Goal is to have the draft portions to OCC and OE by April 24th, 2020; while work continues working on MRP. 3. Proposed Virtual Pre-Inspection Forum with Office of Enforcement – Walter Working with Regional Boards to assist in virtual pre-inspection audits for collection systems via forum 1st week of May 2020. Spreadsheet will be handed out with names of staff interested in participating. 4. Permit Backlog and Permit Reissuance Plan – Gur Permit issuance plans for upcoming FY20-21. Regional Board determines to number of permits committing to adopt or rescind upcoming FY. Email was sent out last week to program managers that contains current plan as reference and universal permits for Regional Boards to determine commit to for the upcoming FY. No current clear guidance on meeting 106 commitments at this moment. Commitments are only a draft to be finalized by the end of the year.		

	5. PG Environmental Scheduled Pre-treatment Inspections – Steve State and Regional Boards have been shadowing PG Env. on inspections/audits, 17 scheduled this year, 5 have been completed, 2 have been completed virtually. Interview and file review where conducted remotely, they will not be deemed complete until physical portion has been complete.
Decisions	
Action Items	Provide spreadsheet with staff interested in forum. [EMBED Excel.Sheet.12]

ITEM	**6**	**Assigned to:**	**Time**
Title of Topic	**REGIONAL BOARD UPDATES**	All	12:40-1:46 (66 minutes)

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Purpose	Updates on Regional Board issues
Desired Outcome	Information Sharing
Background	a. Meeting (or not meeting) our 106 expectations for inspections b. Responding (or not responding) to any requests for NPDES compliance relief (SB and USEPA guidance) c. Any challenges complying with ADA when publicly noticing permits, particularly when teleworking d. Regional Board updates

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Notes	a. Meeting (or not meeting) our 106 expectations for inspections R2 – Has tabled inspections, POTWs are short staffed, wish to maintain social distancing, CEIs require a physical portion. PPE requirements (masks), bioaerosols a concern when working around POTWs, not traditionally provided for Water Board staff when working I the field. Who can provide PPE? Regions? SB? R9 – Moving forward with inspections due to concerns with backlogging of inspections, direction given with site visits can be done virtually. Will be giving POTWs pre inspection checklist with required information with a 30 day turn around to submit, due to short staffing. Envisions a camera onsite for live inspection walkaround. R8 – Staff are completing virtual inspections that will include documentation, calibration and round sheet printouts, corrective/preventative documents, printouts of their SCADA system, if possible real time screen sharing of SCADA system with trending. R5 – Collecting documents from dischargers, direction given by EPA from Enforcement roundtable was that for compliance inspections, a virtual inspection is not acceptable, there must be an in person-inspection. EPA – Current guidance for CEIs is that they do require a onsite inspection to count, but could change as new guidance is available. A major potion of PCIs can be done virtually however field work does need to be completed for PCI reports can be finalized. R1- Two day over the phone pre-inspection meeting for wastewater collection system and plant, followed up with a questionnaire, and this will allow a fastrack in person field inspection when they are allowed to. R4 – CWEA guidance from COVID-19 webinar indicates that COVID-19 can be present in wastewater. Inspections should hold off on inspections until an SOP can be developed on how inspections can be completed safely. [HYPERLINK "http://cweawaternews.org/follow-up-to-cweas-covid-19-webinar-on-4-1-20/"] R1 – Stanford conducting a study in wastewater sampling with COVID-19, Some counties have an order for the wearing of masks for everyone. SB – No new guidance given on provision of PPE. b. Responding (or not responding) to any requests for NPDES compliance relief (SB and USEPA guidance) R9 – Received 2 formal requests R4 – Multiple requests, working on a response template for approval or denial. SB – Received several requests for suspension of monitoring and are in review

R8 – MS4 permits monitoring suspension requests, received 1 request from POTW that has been worked out.

R6 – Received request from CADFW to suspend monitoring for their hatchery due to CDFW laboratory closure.

R1 – Received same request from CDFW.

c. Any challenges complying with ADA when publicly noticing permits, particularly when teleworking

R2 – ADA compliant template status?

SB – Updated template is posted on website.

Note: The numbering system has changed due to requirements of use of letters in headings. If your current documents are passing ADA with DIT you may continue to use your numbering system.

d. Regional Board updates

R1- Santa Rosa and Windsor permits are moving forward and complying with the no net loading requirements. Also working on new permit for Town of Samoa for Humboldt Bay. Working with the City of Eureka compliance with their 2016 permit which changed their discharge from Ocean to Enclosed bay and Estuary policy. City has proposed an ammonia modeling study, (visual plume) to demonstrate compliance with stricter limits and apply for dilution credits. Questioned whether any other Regions have worked with modeling studies to demonstrate compliance, contact Cathie Goodwin (R1) and please cc to Pascal Mues, EPA R9, to provide consistency in judgement for this type of issue.

R2- New General Permit for Fireworks going to board in June 2020, modeled after R9 permit, tentative should be posted on website.

R3- Working on new permit for Cayucas ocean discharge, staff trying to push for recycled water and limit ocean discharge, language in permit that requires 100% of effluent recycling. Received push back from discharger and other agencies that do not want to see that kind of language in permits. Working determining the extent of authority to require or encourage recycling of water

R4- 1st virtual board meeting this week. Lacking in staff due to hiring freeze. Struggling with receiving water temperature limitations. Previous permits allowed exceptions for ambient background temperature limits were not considered violations. New direction given is not provide exemptions. Plan is to conduct studies in temperature with regards to effluent impact. Typically, discharges are exceeding temperature limits in summer that show a correlation in ambient background temperature. Working on bacteria provision on permits. Most POTWs have effluent limits based on title 22 requirements. Bacteria provisions will allow

	POTWs to comply with the more stringent requirements of title 22, while not implementing receiving water bacteria requirements. R5- Also uses bacteria provision approach of using title 22 requirements for bacteria in lieu of basin plan water quality objectives for receiving water. Working on permit for city of Turlock that is trying to reclaim their wastewater and having issues trying to get the reclaimed to the users via Turlock Irrigation District canals that are not designated non municipal domestic supply. Specifically, the use of chlorine for disinfection that cannot meet THM and CTR requirements, currently working on mixing zone analysis for canals that are used only for irrigation. R6- Individual permitting and environmental documentation for a weed control project at Lake Tahoe that may have involve application of aquatic herbicide and individual NPDES permit for LADWP for aquatic herbicide in the Lahontan region. VVWRA, the only NPDES permit in southern Lahontan is scheduled for adoption in May. Currently Coordinating with State Board and PG Env. for a pre-inspection documentation review of scheduled pretreatment inspection for VVWRA. R7- Renewing CAF individual permit, planned public hearing for stakeholders has been placed on hold due to COVID-19, may not meet commitments for this FY for adoption. Renewal of POTW individual permit for Coachella Sanitation District using new ADA template. PCI desktop review completed cannot complete until field inspection is complete. R8- Were in situation in 2013 with backlog of permits, and staff began producing permits for all major dischargers, but now in 2020 will face another backlog due to enforcement, inspections, WDR, recycled water, groundwater replenishment projects and the Poseidon permit project. R9- May will be 1st Virtual Board meeting will take place. Miramar surface water augmentation permit will go for board adoption at this meeting. Working on second ocean water desalination project.
Decisions	
Action Items	

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ITEM	7	Assigned to:	Time
Title of Topic	**WRAP UP**	Region 5 and 6	1:25-1:30 (5 minutes)
Purpose	Wrap Up and Conclude Meeting		
Desired Outcome	Summarize action items from this meeting, potential agenda items for future meetings, and confirm future meeting date.		
Background	Discuss next quarterly meeting location and decide whether teleconference or face to face. Decide on notetaker.		
Attachments/ Links:			
Contact Person	Jim Marshall, Host, [HYPERLINK "mailto:james.marshall@waterboards.ca.gov" Mark Lemus, Notetaker, [HYPERLINK "mailto:mark.lemus@waterboards.ca.gov"		
Notes			
Decisions	R6 Hosting next NPDES Roundtable		
Action Items	Russell Norman (R6) to send survey for next NPDES Roundtable R6 to add Office of Enforcement speaking spot for next NDPES Roundtable Agenda, and all Regional Boards to continue to provide slot for OE. R7 to decide on notetaker. Recordings of NPDES Roundtable available on State Board Sharepoint website.		